

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**CHRISTOPHER EVAN EASTER**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO.:** 1:20cv254-SA-DAS

**ITAWAMBA COUNTY, MISSISSIPPI;**

**SHERIFF CHRIS DICKINSON, individually and**

**In his official capacity as Sheriff of Itawamba**

**County, Mississippi;**

**ITAWAMBA COUNTY SHERIFF'S DEPARTMENT;**

**AND JOHN DOES 1-10; individually and**

**In their official capacities as officers of Itawamba**

**County, Mississippi**

**DEFENDANT**

**JURY TRIAL DEMANDED**

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**COMPLAINT**

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THIS IS AN ACTION to recover actual and punitive damages against individual Defendants, and to recover actual damages against a governmental subdivision. The following facts support this action:

I.

The Plaintiff, **Christopher Evan Easter**, is an adult resident citizen of Amory, Monroe County, Mississippi.

II.

The Defendant Itawamba County, Mississippi is a political subdivision of the State of Mississippi and may be served with process upon its President of the Board of Supervisors, **Eric Hughes**.

III.

The Defendant, **Chris Dickinson**, is the Sheriff of Itawamba County, Mississippi, and at all times acts under the color of state law and may be served with process at his place of employment; **Itawamba County Sheriff's Department**.

IV.

The Defendant, **Itawamba County Sheriff's Department** is a local government entity which carried out the official law enforcement acts of Lee County, Mississippi, by and through its Sheriff. It may be served with process upon its Sheriff, **Chris Dickinson**, at his place of employment, **Itawamba County Sheriff's Department**.

V.

Defendants, **John Does 1-10**, are not known to Plaintiff at this time, and therefore said Defendants are sued by fictitious names. Upon ascertaining the true name of the Doe Defendants, Plaintiff will seek leave to substitute the true name in place of the fictitious name.

VI.

The Court has federal question jurisdiction pursuant to 28 U.S.C. 1331 and civil rights jurisdiction pursuant to 28 U.S.C. 1343, for a cause of action arising under 42 U.S.C. 1983, the Fourth, Eighth and Fourteenth Amendments of the United States Constitution, and this Court has supplemental jurisdiction over Plaintiff's state law claims. Plaintiff sues for violation of his right to be free from cruel and unusual punishment, for the use of excessive force by Itawamba County Jail Staff, for deliberate indifference to serious medical needs, for failure to train, for assault, and for conspiracy to deprive Plaintiff of his right to redress the aforementioned causes of action.

VII.

On or about (????????), while Plaintiff was incarcerated at the Itawamba County, Mississippi jail, Plaintiff was taken to a room by three (3) jailers – two (2) males and one (1) female. In said room, Plaintiff was chained to a chair and assaulted by the three (3) jailers. Plaintiff believes he was assaulted by the three (3) jailers as an act of revenge for false allegations a friend of one or more of the jailers made against Plaintiff. Plaintiff was struck, choked to unconsciousness and had his genitals clamped and twisted until he vomited. When Plaintiff was choked into unconsciousness, the chair he was chained to fell over and Plaintiff struck his head on a filing cabinet causing Plaintiff to bite through his lip.

VIII.

Following the assault, and due to Plaintiff's physical condition as a result of same, Plaintiff was transported via ambulance to the hospital in Amory, Mississippi. Before and during reason for his injuries. After he was returned to the Itawamba County Jail, Plaintiff was held in

solitary confinement until his bruises could heal. Once the injuries were less apparent, Defendants transferred Plaintiff to the Tishomingo County Jail. Defendants informed Tishomingo County that Plaintiff was being held on an investigative hold and instructed to not let Plaintiff contact anyone outside the jail.

IX.

The deputies actions are the result of a failure of the Itawamba County Sheriff to train his deputies.

X.

Plaintiff's injuries include severe emotional distress, trauma, pain and suffering and substantial damages should be awarded.

**PRAYER**

XI.

The Plaintiff prays for actual damages in an amount to be determined by a jury. The Plaintiff further prays for actual and punitive damages against the individual Defendants in an amount to be determined by a jury, and for reasonable attorney's fees.

Respectfully submitted,

/s/ Diana Worthy  
Honorable Diana Worthy  
MSB#104665

/s/ Brent McBride  
Honorable Brent McBride  
MSB#101442

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

We, Diana Worthy and Brent McBride, attorneys for Plaintiff, do hereby certify that we have this day electronically filed the above and foregoing with the Clerk of the Court, utilizing the ECF system, which sent notification of such filing to the following:

Chancery Clerk of Itawamba County, Mississippi  
P.O. Box 776  
Fulton, MS 38843

Itawamba County Sheriff's Office, Mississippi  
201 S. Cummings St.  
Fulton, MS 38843

THIS the 21<sup>st</sup> day of December, 2020.

/s/ Diana Worthy

Honorable Diana Worthy  
MSB#104665

/s/ Brent McBride

Honorable Brent McBride  
MSB#101442